

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LTD.; FTX
TRADING LTD.

Plaintiff,

-against-

VOYAGER DIGITAL, LLC; HTC TRADING
INC.

Defendants.

Adv. Pro. No. 23-50084 (JTD)

Ref. Nos. 1 & 8

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On January 30, 2023, Plaintiff Alameda Research Ltd. (the “Plaintiff”) filed the *Complaint to Avoid and Recover Preferential Transfers* (the “Complaint”) [Adv. D.I. 1] in the above-captioned adversary proceeding against Voyager Digital, LLC and HTC Trading Inc. (collectively, the “Defendants”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. On March 2, 2023, Plaintiffs filed the *First Amended Complaint to Avoid and Recover Preferential Transfers* (the “Amended Complaint”) [Adv. D.I. 8].

3. The Plaintiff and the Defendants (together, the “Parties”) have conferred and agree that the deadline for Defendants to answer, move or otherwise respond to the Amended Complaint shall be extended to April 17, 2023.

4. The Parties’ stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the “Order”).

5. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: March 14, 2023
Wilmington, Delaware

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